

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

DR. BRIMA SYLLA,
CONNOR SPENCE, et al.,

Plaintiffs,

Civil Case No. 23-5261

-against-

AMAZON LABOR UNION, and CHRIS SMALLS,
as President of the Amazon Labor Union,

Defendants.

-----X

**DECLARATION OF
CONNER SPENCE IN
SUPPORT OF ORDER TO
SHOW CAUSE AND STAY**

CONNOR SPENCE, a plaintiff in this action declares, under penalty of perjury, as follows:

1. I was a founding member of the Amazon Labor Union.
2. In June 2022 I was the Treasurer of the Amazon Labor Union (ALU).
3. In June 2022 there were two lengthy Executive Board meetings to revise the ALU Constitution. The purpose of the revision meetings was to fix the first constitution which did not properly establish membership eligibility and had a lot of issues that the company used against us in the LDJ5 campaign. It stretches credulity that we would leave these glaring flaws in there as we launched several more campaigns (ALB1, for instance).
4. After the Board, with counsel present, made their revisions, they were sent out to the membership, with a notice, on an application called Slack, asking them to vote up or down, and if they wanted to, to make comments.
5. Immediately after the adoption of that constitution, the executive board structure was changed to match what was in the amended constitution.
6. After passage counsel directed me to file an LM-1 form with the US Labor Department, Office of Labor Management Services, attaching the amended constitution. I did that, confirmed that I did that with union counsel, and sent union counsel a copy.

7. ALU operated in accordance with the June 2022 Constitution for a period of 6 months.

8. There were meetings called in November to amend the Constitution again. I was on medical leave at the time, and at the time of the meeting I was in a doctor's office. I resigned for medical reasons, shortly thereafter. I knew nothing about the meeting and what it produced until I attended an "open Executive Board Meeting" in December, with about 17 other members, where Chris Smalls announced that we had a new Constitution and that elections were postponed indefinitely. There was a lot of anger at that meeting, no vote was taken, and most of the attendees walked out.

9. I have been threatened, because of my opposition to Smalls and his leadership, with expulsion.

Dated: New York, New York
July 10, 2023

/s/ *Connor Spence*

Connor Spence